

# Exhibit A

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

|                                             |   |                                       |
|---------------------------------------------|---|---------------------------------------|
| UNITED STATES OF AMERICA,                   | ) | CASE NO. CV 20-7811 RS                |
| Plaintiff,                                  | ) |                                       |
| v.                                          | ) | DECLARATION OF JEREMIAH HAYNIE IN     |
|                                             | ) | SUPPORT OF UNITED STATES' MOTION TO   |
|                                             | ) | STRIKE CLAIMANT ROMAN HOSSAIN'S CLAIM |
| Approximately 69,370 Bitcoin (BTC), Bitcoin | ) |                                       |
| Gold (BTG), Bitcoin SV (BSV), and Bitcoin   | ) |                                       |
| Cash (BCH) seized from                      | ) |                                       |
| 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx          | ) |                                       |
| Defendant.                                  | ) |                                       |

I, JEREMIAH HAYNIE, being duly sworn, depose and state:

1. I am a Special Agent with the Criminal Investigation Division of the Internal Revenue Service ("IRS-CI"). I am a case agent assigned to this case. I respectfully submit this declaration to provide certain relevant information in support of the United States' Motion to Strike Claimant Roman Hossain's Claim for Failing to Comply with Supplemental Rule G(5).

2. Based on the information Hossain presented in his claim, I was able to identify his Mt. Gox account from Mt. Gox records IRS-CI received from two separate, reliable sources pursuant to a

1 different investigation. Specifically, the Mt. Gox records revealed that on or about March 1, 2012, a Mt.  
2 Gox account was registered using the email address millions[REDACTED]@gmail.com. The account was  
3 opened with a deposit of \$2,475. The opening date, March 1, 2012, and the amount, \$2,475 both match  
4 the information Hossain provided in paragraph 4 of his claim.

5 3. On May 6, 2012, Individual X stole 70,411.46 BTC from Silk Road and transferred it to  
6 two Bitcoin addresses—1BADznNF3W1gi47R65MQs754KB7zTaGuYZ and  
7 1BBqjKsYuLEUE9Y5WzdbzCtYzCiQgHqtPN.

8 4. Mt. Gox records show that on February 8, 2013 and February 9, 2013, there was a  
9 transfer of 200 BTC and 45.92 BTC out of Hossain's Mt. Gox account for a total of 245.92 BTC. This  
10 matches exactly the amount Hossain claimed was stolen from his Mt. Gox account (245.92 BTC) and  
11 was allegedly sent to Silk Road, from where it was stolen by Individual X (see Hossain claim at  
12 paragraphs 5 and 6).

13 5. Since the 245.92 BTC was transferred out of Hossain's Mt. Gox account approximately  
14 nine months after Individual X stole the bitcoin in question from Silk Road, it is impossible for  
15 Hossain's 245.92 BTC to be part of the BTC Individual X stole from Silk Road on or about May 6,  
16 2012.

17 6. A separate investigation in the Northern District of California, of which IRS-CI was one  
18 of the investigating agencies, revealed that the BTC stolen from Mt. Gox was deposited into wallets at  
19 three different digital currency exchanges: (i) BTC-e; (ii) Trade Hill, another exchange based in San  
20 Francisco; and (iii) back into Mt. Gox into a different Mt. Gox wallet. The BTC-e investigation did not  
21 uncover evidence that the stolen Mt. Gox BTC was sent to Silk Road.

22 7. In approximately February 2014, Mt. Gox closed its exchange service and filed for  
23 bankruptcy protection. The bankruptcy trustee set up a claims process for Mt. Gox accountholders to  
24 file claims.

25 8. Through my investigation I have learned that an individual named Roman Hossain was  
26 convicted of wire fraud and a willful failure to file a tax return in the Central District of California in  
27 2013. I have determined that the Roman Hossain who filed the claim for a portion of the Defendant  
28 Property is the same Roman Hossain that was convicted in that case.

1  
2 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
3 knowledge and belief. Executed this 28<sup>th</sup> day of April, 2021 in East Lansing, Michigan.  
4

5   
6 JEREMIAH HAYNIE

7 Special Agent  
8 Internal Revenue Service – Criminal Investigation  
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